

## REMARKS

Applicants respectfully request reconsideration of the present U.S. Patent application. Claims 10-15 have been cancelled and claims 32-35 have been added. Claims 1, 16, 25, 27, 28, and 29 have been amended in order to clarify the claimed subject matter and not because of the cited art. Thus, Claims 1-9, 16-19, and 25-35 are pending.

### REJECTIONS UNDER 35 U.S.C. § 102(e)

Claims 1-4, 6-7, 10-13, 15-17, 20-21, and 23-29 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,968,116 issued to Day II, et al. (*Day II*). For at least the reasons set forth below, Applicants submit that claims 1-4, 6-7, 10-13, 15-17, 20-21, and 23-29 are not anticipated by *Day II*.

The Manual of Patent Examining Procedure ("MPEP"), in § 2131, states:

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 869 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Thus, under 35 U.S.C. § 102, a claim is anticipated *only if* each and every element of the claim is found in the cited reference and the cited reference must show the invention in as complete detail as contained in the claim.

Amended claim 1 recites:

**obtaining an identifier** from the reported detected alert events; and

**translating** said reported alert events to platform specific alert events by said alert proxy, **wherein translating includes using the obtained identifier to reference an event description file.**

(Emphasis added). Independent claims 16, 25, 27 and 29 similarly recite “obtaining an identifier” and “translating ... wherein translating includes using the obtained identifier to reference an event description file.”

Regarding those claim elements directed to translating, the Office action directs the Applicants’ attention to column 10, lines 47-49, column 15, lines 14-16, and column 7, lines 7-63, wherein *Day II* discloses:

Network management service 190 employs communication service 208 to “translate” the information **to/from the transport layer service**.

... a communication service to translate between different network transport services.

In accordance with the example file transfer datagram of FIG. 3, **file transfer datagram 300** is depicted comprising header 302, version 304, packet type 306, dgram\_size 308, client\_data 310, server\_data 312, sequence field 314, status 316, file handle 318, I\_parm\_1 320, I\_parm\_2 322, data length indicator 324 and data 326.

See column 10, lines 47-49, column 15, lines 14-16, and column 7, lines 7-12 (emphasis added).

Thus, to the limited extent that *Day II*, discusses “translating,” the term is used merely in connection with the process of passing information to and from the transport layer of a network. Specifically, *Day II* discloses that “communication service 208 allows network management service 200 to function regardless of the underlying network transport protocol by abstracting the differences of the supported transport protocols ... into a set of common-denominator functions, and by establishing well-known port or socket addresses for communication service communications.”

*Day II* does not, however, disclose “**translating** [the] reported alert events to platform specific alert events.” More specifically, *Day II* does not disclose “**obtaining an identifier to identify a specific platform type,**” “**an event description file,**” or “**translating ... wherein translating includes using the obtained identifier to reference an event description file.**”

Thus, for at least the above-stated reasons, Applicants respectfully submit that *Day II* does not anticipate independent claims 1, 16, 25, 27, and 29. Claims 10, 20, and 23 have been cancelled without prejudice and thus, the rejection of those claims is moot.

Claims 3-4 and 6-7 depend from claim 1. Claim 17 depends from claim 16. Claim 26 depends from claim 25. Claim 28 depends from claim 27. Claims 30-31 depend from claim 29. Because dependent claims include the limitations of the claims from which they depend, Applicants submit that claims 3-4, 6-7, 17, 26, 28 and 30-31 are not anticipated by *Day II*.

Claims 11-13 and 15 depend from claim 10. Claim 21 depends from claim 20. Claim 24 depends from claim 23. Claims 10, 20, and 23 have been cancelled without prejudice and, thus, the rejection of claims 11-13, 21, and 24 is moot.

#### REJECTIONS UNDER 35 U.S.C. § 103(a)

Dependent claims 5, 14, and 22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Day II* in view of U.S. Patent No. 5,968,176 issued to Nessett, et al. (*Nessett*). Claim 5 depends from claim 1. Claim 14 depends from claim 10. Claim 22 depends from claim 20. Claims 14 and 22 have been cancelled without prejudice and, thus, the rejection of claims 14 and 22 is moot. For at least the reasons sets forth below, Applicants submit that claim 5 is not rendered obvious by *Day II* in view of *Nessett*.

Dependent claim 5 includes the limitations of claims 1 and 4 and further recites:

...composing said network data packet comprises encapsulating said network data packet according to at least one of a plurality of encapsulating protocols including a remote management and control protocol (RMCP) and a simple network management protocol (SNMP).

Thus, claim 5 is directed to encapsulating data packets according to one of a plurality of encapsulating protocols including RMCP and SNMP.

*Nessett* is cited as teaching the encapsulation of data packets according to at least one of a plurality of encapsulation protocols including the Remote Management and Control Protocol and the Simple Network Management Protocol. Whether or not *Nessett* discloses the limitations cited by the Office action, it does not teach or suggest **“obtaining an identifier to identify a specific platform type,” “an event description file,”** or **“translating ... wherein translating includes using the obtained identifier to reference an event description file,”** as recited in claim 1. Because neither *Day II* nor *Nessett* teach or suggest the above-stated claim limitations no combination of *Day II* and *Nessett* teaches or suggests the invention as claimed in claim 5.

Dependent claims 8 and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Day II* in view of U.S. Patent No. 5,689,708 issued to Regnier, et al. (*Regnier*). Claim 8 depends from claim 1. Claim 18 depends from claim 16. For at least the reasons sets forth below, Applicants submit that claims 8 and 18 are not rendered obvious by *Day II* in view of *Regnier*.

Dependent claim 8 includes the limitations of claims 1 and 7 and further recites:

...wherein referencing said description data file comprises referencing a plain text “ini” file.

Dependent claims 18 similarly recites referencing a plain text “ini” file.

*Regnier* is cited as teaching that referencing the description data file comprises referencing a plain text “ini” file. Whether or not *Regnier* discloses the limitations cited by the Office action, it does not teach or suggest **“obtaining an identifier to identify a specific platform type,” “an event description file,”** or **“translating ... wherein translating includes using the obtained identifier to reference an event description file,”** as recited in claim 1. Because neither *Day II* nor *Regnier* teach or suggest the above-cited claim limitations, no combination of *Day II* and *Nessett* teaches or suggests the invention as claimed in claim 5.

Dependent claims 9, 19, and 30 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Day II* in view of U.S. Patent No. 5,860,010 issued to Attal (*Attal*). Claim 9 depends from claim 1. Claim 19 depends from claim 16. Claim 30 depends from claim 29. For at least the reasons sets forth below, Applicants submit that claims 9, 19, and 30 are not rendered obvious by *Day II* in view of *Attal*.

Dependent claim 9 includes the limitations of claims 1 and 7 and further recites:

...wherein referencing said description data file comprises referencing one of a management information format (MIF) file and a management information block (MIB) file.

Dependent claims 19 similarly recites referencing one of a management information format (MIF) file and a management information block (MIB) file.

*Attal* is cited as teaching that referencing the description data file comprises referencing one of a management information format (MIF) file and a management information block (MIB) file. Whether or not *Attal* discloses the limitations cited by the Office action, it does not teach or suggest **“obtaining an identifier to identify a specific platform type,” “an event description file,”** or **“translating ... wherein translating includes using the obtained identifier to reference an event description file,”** as recited in claim 1. Because neither *Day II* nor *Attal* teach or suggest the above-cited claim limitations, no combination of *Day II* and *Attal* teaches or suggests the invention as claimed in claim 9 and 19.

Regarding claim 30, *Attal* is cited as teaching that the translated command data is used to set or clear registers within the other computer device. Whether or not *Attal* discloses the limitations cited by the Office action, it does not teach or suggest **“determining an identifier and using the identifier to reference an event description file,”** as recited in claim 30. Because neither *Day II* nor *Attal* teach or suggest the above-cited claim limitations, no combination of *Day II* and *Attal* teaches or suggests the invention as claimed in claim 30.

Dependent claim 31 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Day II* in view of U.S. Patent No. 6,219,708 B1 issued to Martensen (*Martensen*). For at least the reasons sets forth below, Applicants submit that claim 31 is not rendered obvious by *Day II* in view of *Martensen*.

*Martensen* is cited as teaching "alert explanation in text." Whether or not *Martensen* discloses the limitations cited by the Office action, it does not teach or suggest "determining an identifier and using the identifier to reference an event description file," as recited in claim 30. Because neither *Day II* nor *Martensen* teach or suggest the above-cited claim limitations, no combination of *Day II* and *Martensen* teaches or suggests the invention as claimed in claim 9 and 19.

#### CONCLUSION

For at least the foregoing reasons, Applicants submit that the rejections have been overcome. Therefore, claims 1-9, 16-19, and 25-35 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account number  
02-2666.

Respectfully submitted,  
**BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN, LLP**

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Philip A. Pedigo  
Philip A. Pedigo  
Attorney for Applicant  
Reg. No. 52,107

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, CA 90025-1026  
(503) 684-6200

MARKED VERSION OF THE CLAIMS

1. (Amended). A method comprising:

detecting alert events on a client using a platform independent agent integrated with said client;

reporting detected alert events by said platform independent agent to a remote alert proxy in a platform independent manner complemented by a platform type;

obtaining an identifier from the reported detected alert events; and

translating said reported alert events to platform specific alert events by said alert proxy, wherein translating includes using the identifier to reference an event description file.

16. (Amended) In a server, a method comprising:

receiving detected alert events of a client device from an integrated platform independent agent of the client device, in a platform independent manner complemented with a platform type;

obtaining an identifier from the received detected alert events; and

translating said received alert events to platform specific alert events wherein translating includes using the obtained identifier to reference an event description file.

25. (Amended) An apparatus comprising logic to:

receive detected alert events of a device from an integrated platform independent agent device in a platform independent manner complemented with a platform type;

obtaining an identifier from the received detected alert events; and



translate said received alert events to platform specific alert events wherein translating includes using the obtained identifier to reference an event description file.

27. (Amended) An article of manufacture comprising a machine readable medium having a plurality of machine readable instructions stored thereon, wherein when the instructions are executed by a processor, the instructions subscribe the processor to:

receive detected alert events of a device from an integrated platform independent agent device in a platform independent manner complemented with a platform type;

parsing the received detected alert event according to an encapsulation protocol;

assigning values obtained by parsing the data packet to predetermined variables; and

translate said received alert events to platform specific alert events, wherein translating includes comparing the assigned values to an event description file to determine platform specific alert information.

28. (Amended) The article of manufacture of claim 27, wherein said instructions further subscribe the processor to [translate said received alert events to platform specific alert events by referencing a description data file using said platform type] report a plain text description corresponding to the alert event.

29. (Amended) A system comprising:

a computing device having a management application and an alert proxy, the alert proxy to translate command data received from the management application into device-specific

control data wherein translating includes determining an identifier and using the identifier to reference an event description file; and

an other computing device coupled to the computing device having a platform-independent alert detection element to report detected alert events to the computing device.

32. (New). A method comprising:

receiving a data packet containing an alert message;

parsing the data according to an encapsulation protocol;

assigning values obtained by parsing the data packet to predetermined variables; and

comparing the assigned values to an event description file to determine platform specific alert information.

33. (New). The method of claim 32 wherein comparing the assigned values further includes determining whether the alert message describes a simple event, a compound event, or a software event.

34. (New). The method of claim 33 further comprising, reporting a plain text description corresponding to the alert event.

35. (New). The method of claim 32, wherein assigning values obtained by parsing the data packet further comprises obtaining an identifier to identify a platform type corresponding to the alert message.

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